

Jack H. Karpeles SBN 134478  
1150 W. 13th St., Unit # 204  
San Pedro, CA 90731-3868  
(T) 310-738-7020; (F) 310-831-8780  
[jackhkesq@outlook.com](mailto:jackhkesq@outlook.com)  
Attorney for Defendants Chung Soonkyo, LLC,  
Comet Hyesung, LLC, and Caroline S. Lee

**UNITED STATES DISTRICT COURT  
CENTRAL DISTRICT OF CALIFORNIA**

Bow Tie Realty and Investment, Inc. } CASE NO: 21STCV35370  
Plaintiff, }  
v. } DEFENDANTS' NOTICE OF  
Chung Soonkyo, LLC, Comet } REMOVAL (FEDERAL QUESTION  
Hyesung, LLC, and Caroline S. Lee; } JURISDICTION)  
and DOES 1-100, }  
Defendants.

TO THE CLERK OF THE ABOVE-ENTITLED COURT:

PLEASE TAKE NOTICE that Defendants Chung Soonkyo, LLC, Comet Hyesung, LLC, and Caroline S. Lee (“Defendants”) hereby remove the captioned case from the Superior Court of the State of California for Los Angeles County

1 (Case 21STCV35370) to the United States District Court for the Central District  
2 of California, and states the following reasons for removal:

3 This civil action is being removed under 28 U.S.C. § 1441 (a) in that it  
4 presents a claim or right arising under the laws of the United States, specifically,  
5 where state law governing court trials interferes with federally created rights  
6 concerning nondiscrimination against individuals on the basis of a disability in  
7 regard to the full and equal enjoyment of services, specifically, 42 U.S.C. §12182,  
8 over which this Court has original jurisdiction.

9 Plaintiff, Bow Tie Realty and Investment, Inc., a California corporation,  
10 filed its action in state court on September 27, 2021, in Los Angeles Superior  
11 Court.

12 The original complaint does not indicate grounds for removal. However,  
13 the court file shows that Defendant Caroline Lee meets the definition of a  
14 disabled person under 42 U.S.C. §12182ff and for whom numerous instances  
15 have occurred wherein Defendant Lee has encountered barriers from the Los  
16 Angeles Superior Copurt, or has otherwise been discriminated against on the  
17 basis of disability in the full and equal enjoyment of the goods, services, facilties,  
18 privileges, advantages and/or accommodations during the course of court  
19 proceedings for the aforementioned case 21STCV35370.

20  
21 Defendant is filing this Notice of Removal within 30 days of the filing of  
22 the most recent discriminatory act of the Los Angeles Superior Court, specifically  
23 that of December 28, 2023, ruling against access to medical care.

24 Accordingly, removal is timely filed pursuant to 28 U.S.C. 1446(b)(3).  
25 Pursuant to 28 U.S .C. § 1446(a), this Notice is properly filed in the United States  
26 District Court for the Central District of California, which is the district court of  
27

1 the United States for the district and division within which the State Action is  
2 pending. Venue is proper in this Court.

3 A copy of this Notice of Removal is being filed with the clcrk of the  
4 Superior Court of the State of California for Los Angeles County.

5 A copy of this Notice of Removal is also being served on counsel for  
6 Plaintiff.

7 The process, pleadings, and orders served upon Defendants in state court  
8 are attached as exhibits and consists of Exh. A (pp. 1-5): Plaintiff's complaint in  
9 state court on September 27, 2021.

10 WHEREFORE, Defendants respectfully give notice that the above-  
11 entitled action is removed from the Los Angeles County Superior Court to the  
12 United States District Court for the Central District of California.  
13

14 Dated: January 02, 2024

15 /s/ *Jack H. Karpeles*

16 Jack H. Karpeles

17 Attorney for Defendants Chung Soonkyo, LLC,  
Comet Hyesung, LLC, and Caroline S. Lee